

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)	
)	No. 3:22-cr-00282
v.)	
)	JUDGE RICHARDSON
[1] GLEN CASADA)	
[2] CADE COTHREN)	

**GOVERNMENT’S UNOPPOSED MOTION TO CONTINUE TELEPHONIC HEARING
AND STAY PRETRIAL DEADLINES**

The United States of America, through Thomas Jaworski, First Assistant United States Attorney for the Middle District of Tennessee, Assistant United States Attorney Amanda J. Klopf, Corey R. Amundson, Chief of the Public Integrity Section of the United States Department of Justice, and Trial Attorneys John P. Taddei and Blake J. Ellison (collectively, “United States” or “government”), respectfully moves this Court to continue the telephonic hearing scheduled for January 25, 2024, at 9:30 a.m. CT until any time on February 1 or 2 or at another date or time soon thereafter that is convenient for the Court. The government also moves the Court to stay all pretrial deadlines pending the rescheduled telephonic hearing.

On January 17, 2024, the Court entered an order scheduling a telephonic hearing on January 25, 2024, at 9:30 a.m. to address the pending motions to dismiss, motion to strike and, if appropriate, defendant Cothren’s motion to continue. Doc. No. 110. None of the government attorneys assigned to this case are available on January 25 due to preexisting commitments. Ms. Klopf expects to be in trial in *United States v. Gallagher*, No. 3:22-cr-00327 (M.D. Tenn.); Mr. Taddei will be traveling out of the country January 25-29; and Mr. Ellison will be on leave for a family-related commitment. The government has conferred with counsel for defendants Cothren and Casada, who do not oppose a continuance of the hearing and staying of pending pretrial

deadlines and have stated that they are available to participate in a hearing on February 1 or 2.

CONCLUSION

For the foregoing reasons, the government respectfully requests that the Court reschedule the January 25 telephonic hearing for February 1 or 2 or at another date or time soon thereafter that is convenient for the Court, and that the Court stay all pretrial deadlines pending that hearing.

Respectfully submitted,

THOMAS JAWORSKI
Attorney for the United States
Middle District of Tennessee
Acting Under Authority Conferred by 28
U.S.C. § 515

COREY R. AMUNDSON
Chief
Public Integrity Section

By:

By:

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing response was electronically filed with the Clerk on January 17, 2024, and service was made upon all persons registered in that case via CM/ECF and/or by email.

/s/ John P. Taddei
JOHN P. TADDEI
Trial Attorney